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October 4, 2011

Hon. Arlene R. Lindsay
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: New Angle Pet Products, Inc., et al.
v. AbsolutelyNew, Inc.
Case No. 10-CV-2700 (SJF)(ARL)

Dear Judge Lindsay:

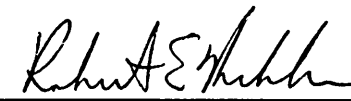
Pursuant to Local Civil Rule 37.3, plaintiffs respectfully request the assistance of the Court in obtaining a response to plaintiffs' Interrogatories in Aid of Execution, a copy of which is annexed hereto. Said interrogatories were served July 8, 2011. Defendant responded on September 12, 2011, refusing to fully answer most of the interrogatories until a protective order was in place. Amendments to the defendant's proposed Stipulated Protective Order, requested by plaintiffs, were agreed to by defendant's counsel on September 15, 2011, but despite defendant's promise to forward the amended document for execution the week of September 19th, no response has been received.

Plaintiffs believe the defendant is deliberately delaying its response to the interrogatories so that defendant can conceal assets or attempt to reconfigure the company to place assets beyond plaintiffs' reach. Unless the Court sets a firm schedule for defendant's responses, defendant will continue to "drag its feet." I advised defendant's counsel in early August and again on September 1, that I would seek the Court's assistance if a response to the interrogatories was not forthcoming. Since all my good faith efforts to resolve this discovery dispute without the Court's intervention have failed, I believe a motion is justified at this time.

Very truly yours,

WECHSLER & WECHSLER, P.C.

By



Robert E. Wechsler

REW:mk
FILED BY ECF

cc: Anthony R. Flores, Esq., General Counsel
AbsolutelyNew, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
NEW ANGLE PET PRODUCTS, INC. and
ONE BARSTOW PROPERTIES, INC.,

Plaintiffs,

v.

ABSOLUTELYNEW, INC.,

Defendant.
-----X

INTERROGATORIES
IN AID OF EXECUTION

Case No. 10-CV-2700
(SJF) (ARL)

TO: THE JUDGMENT DEBTOR

PLEASE TAKE NOTICE that pursuant to Rule 69(a) of the Federal Rules of Civil Procedure, the judgment creditors, New Angle Pet Products and One Barstow Properties, Inc., the plaintiffs in the above entitled action, propound the following interrogatories to the judgment debtor, AbsolutelyNew, Inc., the defendant in the above entitled action, to be answered separately and under oath, in accordance with New York CPLR Article 31.

DEFINITIONS AND INSTRUCTIONS

A. As used herein, the term "judgment debtor" shall refer to AbsolutelyNew, Inc. and its subsidiaries.

B. As used herein, the term "person" is defined as any natural person or any business, legal or governmental entity or association.

C. As used herein, the term "identify" when referring to a person, means to give, to the extent known, the person's full name, present or last known address, and when referring to property, whether real, personal, tangible or intangible, means to give, to the extent known, a full description of said property sufficient to distinguish said property, together with its location and, if the judgment debtor is not in possession of same, identify the custodian of said property.

INTERROGATORIES

1. Identify all shareholders, directors, and officers of the judgment debtor.
2. Identify any subsidiaries of AbsolutelyNew, Inc.
3. Identify all assets of the judgment debtor, including but not limited to real estate owned and/or leased, cash or cash equivalents, inventory, equipment, and intellectual property rights. Set forth legible copies of all applicable deeds, leases, most recent bank statements and/or inventories, patents, trademarks, licenses and contracts associated with the identified assets.
4. Identify any person carrying on an insurance business who may be liable to satisfy part or all of the judgment entered in the above entitled action, or reimburse for payments

made to satisfy the judgment.

5. Has the judgment debtor prepared or issued any financial statements during the past two years? If yes, set forth legible copies of all such financial statements.

6. Where does the judgment debtor file its Federal and State income tax returns? Set forth legible copies of the judgment debtor's Federal and State income tax returns for the past two years.

7. Identify all persons responsible for preparing and maintaining the judgment debtor's financial records.

Dated: July 8, 2011

WECHSLER & WECHSLER, P.C.

By: 

Robert E. Wechsler (RW 8735)
Attorneys for Judgment Creditors
Office and P.O. Address
One Barstow Road
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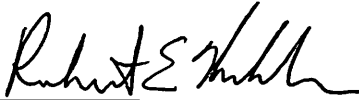
TO: Anthony R. Flores, Esq.
Attorney for Judgment Debtor
AbsolutelyNew, Inc.
650 Townsend Street, Suite 475
San Francisco, CA 94103

CERTIFICATE OF SERVICE

I, Robert E. Wechsler, hereby certify that on July 8, 2011, I served copies of the foregoing Interrogatories in Aid of Execution by mailing copies of same by First Class Mail to the following:

Anthony R. Flores, Esq.
AbsolutelyNew, Inc.
650 Townsend Street, Suite 475
San Francisco, CA 94103

Dated: July 8, 2011



Robert E. Wechsler